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February 21, 2023

VIA ECF

Hon. Sarah L. Cave
United States Magistrate District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Nochimson v. Oasis Luxe Management & Co. Inc. et al.*,
22 Civ. 7197 (PAE) (SLC)

Dear Judge Cave:

On February 17, 2023, a process server delivered a copy of the Summons and Complaint in the referenced action to the offices of Sullivan & Worcester LLP ("S&W"). We infer that plaintiff arranged for this delivery under authority of the Court's order dated January 27, 2023 (ECF 25) ("Order"). We believe the Court has been misinformed about S&W's relationship with defendant Michael Memon.

In her counsel's submission dated January 26, 2023, ECF 24, plaintiff identified S&W as "counsel of record" for Mr. Memon. That is incorrect. S&W represented Mr. Memon only briefly, between February 3, 2021 and July 26, 2021.

Plaintiff relies solely on a letter, Exhibit B to ECF 24, dated March 23, 2021, from S&W to New York Supreme Court Justice Perry concerning *Oasis Luxe Management & Co, Inc. v. Memon*, Index No. 152855/2021 (Sup. Ct. N.Y. Cnty.). That action was discontinued only weeks later by stipulation dated April 9, 2021 and filed on April 12, 2021. *Id.*, NYSCEF Doc. No. 57.

S&W has no ongoing relationship with Mr. Memon except in connection with efforts to collect outstanding legal fees. We are not authorized to accept service on Mr. Memon's behalf (or on behalf of any other party to this action).

We respectfully request that the Court revise its Order to rescind any authorization to serve defendants via S&W.

Respectfully submitted,

/s/ Michael T. Sullivan

Michael T. Sullivan

cc: All Counsel of Record